

Exhibit U

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to

DECLARATION OF CHRIS PARKER

0:17-cv-02832	0:17-cv-04943
0:17-cv-04613	0:17-cv-04944
0:17-cv-04614	0:17-cv-04945
0:17-cv-04615	0:17-cv-04947
0:17-cv-04616	0:17-cv-05046
0:17-cv-04617	0:18-cv-01562
0:17-cv-04618	0:18-cv-01572
0:17-cv-04619	0:18-cv-01573
0:17-cv-04622	0:18-cv-01565

I, Chris Parker, am over the age of 18, make this declaration based on my own personal knowledge, and am competent to testify to the matters contained herein if called upon to do so.

1. I am Principal Architect in CenturyLink's Consumer Advocacy Group ("CAG"). Previously, I was Principal Architect in CenturyLink's Information Technology Group ("IT"). I am employed by Qwest Corporation and work at CenturyLink's headquarters in Monroe, Louisiana.

2. My current responsibilities include data analytics for the CAG and technical guidance for the integration and implementation of software and technology to support the CAG. Previously in IT my responsibilities were similar but as an enterprise resource supporting many departments across the CenturyLink Companies. In these roles

I have gained significant familiarity with CenturyLink's systems and data supporting its consumer business.

3. When I use the term "CenturyLink" or "CenturyLink Companies" in this declaration, I am referring to the family of corporate entities that commonly use the trade name "CenturyLink."

4. CenturyLink's counsel has provided me a list of 1,000 arbitration demands including names, addresses, phone numbers, email addresses, and CenturyLink account numbers (the "Claimant List").

5. I have used the information provided on these lists to attempt to locate in CenturyLink's Combined Company Data Warehouse ("CCDW") and related sources records associated with the individuals on the Claimant List. I also collaborated with Josh Parker, Lead Analyst in CenturyLink's Finance organization. Josh attempted to locate in CenturyLink's Ensemble database additional records associated with the individuals on the Claimant List. Based on these efforts, I have matched CenturyLink accounts to 941 of the 1,000 individuals on the Claimant List, with varying degrees of confidence.

6. The limited nature of the information provided in each list created difficulties in gaining high confidence in the resulting matches. The mass nature of the information available also negatively impacted matching confidence. CenturyLink's consumer systems are designed for individual engagement, where customers can provide follow-up information to CenturyLink customer service agents to confirm their account

and CenturyLink customer service agents can quickly find relevant information. While CenturyLink has the ability to run mass queries against its customer data, attempting to match accounts to mass data elements is a less reliable process.

7. First and last names are not unique identifiers on their own because many names are shared and common among many people, and when searching across multiple data tables the form of the names can be different, and the names featured on the Client List and Claimant List also may differ from those found in CenturyLink's customer records. For instance, some of the names on the Claimant List, such as the name supplied for Demand_51, do not appear to be authorized users on the accounts associated with other identifiers they supplied.

8. Phone numbers are not unique identifiers on their own because those numbers are reusable within 90 days of disconnection, meaning that over the last six years a particular phone number could have been reassigned 24 times or more. For instance, the phone number supplied in Demand_122 has been assigned to three additional CenturyLink customers.

9. Addresses are not unique identifiers on their own because multiple people can live at the same addresses over time. Given the nature of CenturyLink's service network, CenturyLink is often a continuous provider of telecommunications services to the same addresses for different account holders as occupants come and go. Further, addresses are easily mis-keyed and contain various non-standard abbreviations that can

impact matching confidence. For instance, Demand_69 supplied a mis-keyed address that required further manual searching to correct.

10. Email addresses are not unique identifiers on their own because many customers have multiple email addresses, some found in their account records and some not. Email addresses also can be associated to accounts in error depending on the source of the email address, e.g., those acquired by a third-party marketing vendor. The email address supplied in Demand_122 is also associated with a different customer's CenturyLink account.

11. While CenturyLink account numbers are typically the most-reliable attribute for locating an account match, even searching by account number is limited to the accuracy of the account number supplied. For example, the Claimant List included what were represented to be CenturyLink account numbers, but of the 1,006 claimed account numbers, only 678 appear to be in a CenturyLink account number format, and of those 509 matched a known CenturyLink account number.

12. In order to gain confidence in potential account matches, I attempted to match to various combinations of the above data elements to the data found in CCDW, and Josh Parker did the same for the data found in Ensemble. This process generated a list of reasonable potential account matches to the individuals found in the Claimant List.

13. I generated an initial pool of 2,298 possible matched accounts. After applying the matching criteria, I narrowed that pool to 1,107 possible matched accounts

associated with 941 of the 1,000 entries on the Claimant List. Thus, after applying this search criteria, I was unable to locate any possible account matches to 59 entries on the Claimant List, comprising nearly 6% of the entries on the Claimant List.

14. I generated a list of these 59 remaining unmatched entries that the CAG then attempted to locate using individualized manual searches in CenturyLink's customer data. The CAG ultimately located accounts that appear to match the information supplied in the Claimant List for 58 of those 59 remaining entries, resulting in matches of some level of confidence for 999 of the 1,000 entries on the Claimant List. Demand_882 remains unmatched after these efforts.

15. With these limitations in mind, I next ran the following queries against the matched account data to determine the following:

- a. There are 29 entries on the Claimant List that do not appear to have ever subscribed to a CenturyLink internet service;
- b. There are 74 Claimants whose accounts were closed for any reason on or before June 17, 2014;
- c. There are 4 Claimants whose last service order was on or before May 18, 2014;
- d. There are 55 Claimants whose accounts were closed for any reason after June 17, 2014 and on or before June 17, 2016;

- e. There are 24 Claimants whose last service order after May 18, 2014, and on or before May 18, 2016;
- f. There are 339 Claimants whose accounts have been put into collections or written off, or whose accounts have an outstanding past-due balance 90 days or older;
- g. Of those Claimants whose accounts have been put into collections or written off, or whose accounts have an outstanding past-due balance 90 days or older, there are 81 whose accounts have balances of \$250 or more and another 184 whose accounts have balances of \$50 to \$249.
- h. There are 114 Claimants whose accounts CenturyLink adjusted or credited \$250 or more; and finally
- i. There are 392 Claimants whose accounts CenturyLink adjusted or credited \$30 to \$249.

Dated: 1-6-20

I hereby declare under the penalty of perjury
that the foregoing is true and correct


Chris Parker